

AO 442 (Rev. 11/11) Arrest Warrant

RECEIVED
USMS HARRISBURG, PA

UNITED STATES DISTRICT COURT

2018 MAR 20 AM 9:17

for the

Middle District of Pennsylvania

United States of America

v.

Raekwon Grant

Case No. 1:17-CR-226

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Raekwon Grant

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Criminal Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance.

Date: 03/19/2018

s/Anita A. Arledge

Issuing officer's signature

City and state: Harrisburg, PA

Anita A. Arledge, deputy clerk

Printed name and title

Return

This warrant was received on (date) 8/14/2018, and the person was arrested on (date) 8/14/18
at (city and state) Harrisburg, PADate: 8/14/2018

Arresting officer's signature

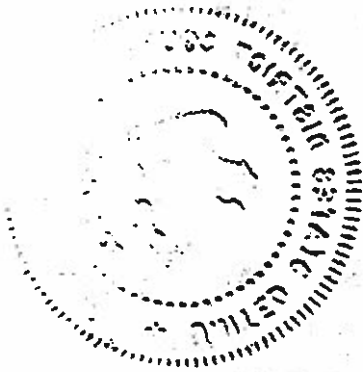
DUSM M. ULRICH

Printed name and title

RECEIVED

2018

2018



10356957

AO 257
(Rev. 9/92)

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION

-- IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING

LEAD OFFENSE CHARGED

POSSESSION OF A FIREARM BY A
CONVICTED FELON

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

Place of offense
York CountyU.S.C. Citation
18 / 922(g)(1)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

IATF - SA Ryan Anderson

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense

Judge's Name If Related

☐ this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

1:17-CR-266

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded underMAGISTRATE
JUDGE CASE NO.
1:17-MJ-60Name and Office of Person
Furnishing Information on

THIS FORM

DAVID J. FREED

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S.
Att'y (if assigned)

MEREDITH A. TAYLOR

Defense Attorney

Name of District Court, and/or Judge/Magistrate Judge Location (City)

Middle District of PA / Judge

DEFENDANT -- U.S. vs.

RAEKWON GRANT

Address
171 Ocean Avenue
Jersey City, NJ 07305Birth Date
12-15-95 ☒ Male ☐ Alien
☐ Female (if applicable)SSN or A# ☐ Interpreter ☐ Yes ☐ No

(Optional unless a juvenile)

DEFENDANT

IS NOT IN CUSTODY

- 1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer
been filed? ☐ Yes
☐ NoIf "Yes,"
give date
filed

Mo. Day Year

DATE OF
ARREST 7/7/2017

Or ... If Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED
TO U.S. CUSTODY☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Count 3 / 21 U.S.C. 846
Count 4 / 21 U.S.C. 841(a)(1)

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2

(Possession of a Firearm in Furtherance of Drug Trafficking)

THE GRAND JURY FURTHER CHARGES:

On or about July 7, 2017, in the Middle District of Pennsylvania,
the defendant,

ERNEST KYLE DYER,

did knowingly possess a firearm, that is, a Hi-Point .40 caliber semi-automatic handgun, model JCP, serial number X7259647, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, specifically, possession with intent to distribute a controlled substance and conspiracy to distribute and possess with intent to distribute a controlled substance.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3
**(Criminal Conspiracy to Distribute and Possess
With the Intent to Distribute Pentylone)**

THE GRAND JURY FURTHER CHARGES:

Beginning on or about February 1, 2017 through on or about July 7, 2017, in the Middle District of Pennsylvania, the defendants,

ERNEST KYLE DYER and RAEKWON GRANT

and others known and unknown to the Grand Jury did intentionally and knowingly unlawfully conspire and agree with each other and with others to distribute and possess with the intent to distribute pentylone, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 846.

COUNT 4

**(Distribution and Possession With the Intent
to Distribute a Controlled Substance)**

THE GRAND JURY FURTHER CHARGES:

On or about July 7, 2017, in the Middle District of Pennsylvania,
the defendants,

ERNEST KYLE DYER and RAEKWON GRANT,
did knowingly and intentionally possess with the intent to distribute
pentylone, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT 5

(False Statement During Purchase of a Firearm)

THE GRAND JURY FURTHER CHARGES:

On or about May 23, 2017, in the Middle District of Pennsylvania,
the defendant,

ANNIE RUTH DYER,

in connection with the acquisition of a firearm, that is, a Hi-Point .40 caliber semi-automatic handgun, model JCP, serial number X7259647, from Gander Mountain, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false written statement to Gander Mountain, which statement was intended to and likely to deceive Gander Mountain as to a fact material to the lawfulness of such sale of the firearm to the defendant under Chapter 44 of Title 18; that is, the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 and represented she was the actual buyer of the firearm, when she was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL



FOREPERSON, GRAND JURY

DAVID J. FREED
UNITED STATES ATTORNEY

BY: Meredith A. Taylor
MEREDITH A. TAYLOR
ASSISTANT U.S. ATTORNEY

3-14-18
DATE

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

MAR 14 2018

PER

DEPUTY CLERK

UNITED STATES OF AMERICA

NO. 1: 17-CR-226

v.

(JUDGE RAMBO)

(ELECTRONICALLY FILED)

ERNEST KYLE DYER,
aka "K,"
RAEKWON GRANT and
ANNIE RUTH DYER

**NOTICE REGARDING SUPERSEDING
INDICTMENT**

AND NOW, pursuant to LCrR. Rule 7.1, the United States submits the following Notice Regarding the Superseding Indictment filed in this matter, identifying for the Court and the defendant the differences between the current, superseding indictment returned by the Grand Jury and the prior indictment:

 X 1. With respect to this Defendant, this superseding indictment adds the following new counts:

| COUNT | OFFENSE | PENALTY |
|-------|----------------|-------------------|
| Two | 18 USC §924(c) | Lifetime in jail; |

| | | |
|-------|----------------|---|
| | | \$ 250,000 fine; up to lifetime supervised release; \$100 special assessment. |
| Three | 21 USC §846 | 20 years in jail; \$1,000,000 fine; up to 5 years supervised release; \$100 special assessment. |
| Four | 21 USC §841(a) | 20 years in jail; \$1,000,000 fine; up to 5 years supervised release; \$100 special assessment. |

____2. With respect to this Defendant, this superseding indictment makes the following changes to previously charged offenses:

| COUNT | REVISION IN SUPERSEDING INDICTMENT |
|-------|------------------------------------|
| | |
| | |

 X 3. This superseding indictment includes the following additional defendants and charges:

| ADDITIONAL DEFENDANTS | COUNTS |
|-----------------------|--------------|
| RAEKWON GRANT | THREE & FOUR |
| ANNIE RUTH DYER | FIVE |

X 4. Regarding this superseding indictment, the United States:

 X Intends to file a motion for a continuance of trial.

 Does not intend to file a motion for a continuance of trial.

The United States hereby places the defendant on notice that this superseding indictment contains these revisions to the charges initially filed in this case.

Respectfully submitted,

DAVID J. FREED
UNITED STATES ATTORNEY

BY: /s/ Meredith A. Taylor
MEREDITH A. TAYLOR
ASSISTANT U.S. ATTORNEY
228 Walnut St., P.O. Box 11754
Harrisburg, PA 17108
717/221-4482 (Office)
717/221-4493 (Fax)
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PA 205058

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

MAR 14 2018

PER

DEPUTY CLERK

IN RE SEALED MATTER

CR. NO.

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

DAVID J. FREED
United States Attorney

BY: s/Meredith A. Taylor
MEREDITH A. TAYLOR
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FILED
HARRISBURG, PA

MAR 14 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DEPUTY CLERK

UNITED STATES OF AMERICA : CRIMINAL NO. 1:17-CR-226
 :
 v. : (Judge Rambo)
 :
 ERNEST KYLE DYER aka "K", :
 RAEKWON GRANT, and :
 ANNIE RUTH DYER :

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

| | |
|---|--|
| <input checked="" type="checkbox"/> Superseding Indictment | <input type="checkbox"/> Information |
| <input type="checkbox"/> Complaint, Arrest Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Plea Agreement | <input type="checkbox"/> Motion to Redact Indictment |

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

☒ The arrest of the Defendant(s);
☐ Further Order of Court;
☐ Written notification by the United States that these pleadings no longer need to remain filed under seal; or
☐ Until a return is made of the search warrant by the

executing agents.

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☐ Preserve the integrity of this ongoing case;
- ☐ Ensure the safety of investigative personnel;
- ☐ Protect the identity of potential witnesses;
- ☐ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of criminal laws; or
- ☐ Allow this defendant to complete the cooperation aspects of the plea agreement.
- ☐ Avoid unfair prejudice to the defendants

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

DAVID J. FREED
United States Attorney

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FILED
HARRISBURG, PA

MAR 14 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DEPUTY CLERK

IN RE SEALED MATTER

CR. NO.

1.7-CH-0220

ORDER

IT IS ORDERED that the Clerk of Court provide the United States Attorney's Office with two (2) certified copies of the accompanying documents and thereafter keep these documents from public view until the Clerk has made appropriate docket entries.

IT IS FURTHER ORDERED that these documents only be opened by appropriate Court personnel of the Middle District of Pennsylvania in due course of performing the business of the Clerk's Office, after which the Clerk is ordered to seal this Order and all accompanying documents until:

- ☐ [] Notified in writing by the United States Attorney's Office that there is no longer any reason for the documents to remain sealed;
- ☐ [] Further Order of the Court;
- ☒ [X] The person(s) named in these documents (has) (all have) been arrested. If there is a continued need for the documents to remain sealed after arrest, the United States Attorney's Office shall file a motion to that effect and a proposed Order; or
- ☐ [] Until a return is made of the search warrant by the executing agents.



[/] UNITED STATES DISTRICT JUDGE
[/] UNITED STATES MAGISTRATE JUDGE

DATE: 3-14-18

FILED
HARRISBURG, PA

MAR 14 2018

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DEPUTY CLERK

UNITED STATES OF AMERICA) **CRIMINAL NO. 1:17-CR-226**
)
 v.) **(JUDGE RAMBO)**
)
 RAEKWON GRANT)

ORDER FOR WARRANT

AND NOW, this 14th day of March, 2018, upon request of David J.

Freed, United States Attorney for the Middle District of Pennsylvania,

IT IS HEREBY ORDERED that a warrant be issued for the arrest of the above-named defendant, **RAEKWON GRANT**, and a United States Magistrate is authorized and directed to conduct a hearing, under the Bail Reform Act of 1984, for the purpose of determining what bail, if any, is necessary in order to insure the presence of the defendant in this case.

IT IS FURTHER ORDERED that at the time service of the warrant is made, the United States Marshal also serves upon the defendant a certified copy of the Indictment in the above-named case.

Martin C. Carlin

☒ UNITED STATES DISTRICT JUDGE
☐ UNITED STATES MAGISTRATE JUDGE